

# Exhibit M

Declaration of Bill Warren



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## DECLARATION OF BILL WARREN

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I, Bill Warren, hereby state that I have personal knowledge of the facts set forth below, and the facts contained herein are true to the best of my recollection, except for those facts which are alleged to be upon information and belief, and as to those allegations, I hereby certify I believe the same to be true. If called as a witness, I would competently testify as follows:

1. I am a United States citizen and am over 18 years of age. I reside in Knox County, Tennessee.
2. I am employed by Knoxville Utilities Board ("KUB") as the Team Lead of Development and Renewables ("DER").
3. In my role as Team Lead of Development and Renewables, I oversee the KUB DER interconnection process. This process includes conducting initial plans review, ensuring all appropriate documents are in order and in their proper place (*e.g.*, agreements, applications, plans, permits), and addressing all questions and concerns from solar installers and customers. I also act as KUB's solar subject matter expert.
4. Prior to joining the KUB, I worked for Osmose Utilities Services, Inc. as a Supervisor of Operations.
5. I began administering the various Tennessee Valley Authority ("TVA") and KUB renewable program offerings in 2014 and over the next several years attended many conferences and extended training sessions to gain real-world and technical knowledge on grid-integrated solar installations. I help represent KUB on the Tennessee Valley Public Power Association Solar Advisor Group and serve on the KUB Utility Transformation Team.

6. I hold a North American Board of Certified Energy Practitioners (“NABCEP”) Associate Level certification along with a fully Certified Photovoltaic (“PV”) Inspector Certification.
- ~~7. I have been involved in the interconnection and commissioning process on over 200 DER~~  
projects in our service territory in the last 8 years working with around a dozen solar installers.
8. The National Electrical Code (“NEC”) dictates the majority of private solar installation regulations. KUB defers to either the State of Tennessee or City of Knoxville Electrical Inspectors to review appropriate installation of the panels, inverters, wiring, etc.
9. KUB’s Electric Rules and Regulations require KUB’s written permission for any form of system interconnection.
10. In order to gain KUB’s permission to interconnect KUB requires that a certain procedure be followed. The procedure’s requirements should be facilitated and/or completed by the Solar Installer.
  - a. First, the customer must sign and submit an Application for Interconnection that includes a single-line drawing of the proposed system, a system design, the model number(s) of the battery and/or equipment to be installed, and, where applicable, an equipment “cut-sheet” that describes the equipment’s specifications. (with system design, equipment cutsheets where applicable, single-line drawing, etc.).
  - b. If the application is approved, the solar installer must apply for all requisite permitting before the installation can begin. The permitting process can be done online.
  - c. As part of the installation, the solar installer is required to include a manual, lockable, readily accessible disconnect.

- d. Once the system is fully installed and all inspections passed, the customer must request a solar commissioning and sign an interconnection agreement.
  - e. Before a solar system can be made operational, KUB must exchange the electric meter to allow for bi-directional, multi-channel metering.
  - f. Once everything is approved and installed, and once the Interconnection Application fee is paid, the system will be granted permission to operate.
11. KUB keeps electronic copies of all interconnection applications, agreements, and system design packages submitted. We also input the details into our Customer Information System and flag the site in our mapping system, so our linemen know where the installations are located.
12. If a solar installer attempts to turn on a system before the bi-directional meter can be installed or before the system is fully commissioned, KUB will be able to detect reverse flow onto the grid. While this reverse flow does not in and of itself pose a danger to KUB line workers, the line workers are put at risk by the fact that KUB is unable to map non-commissioned generation sites in its outage mapping systems.
13. In other words, if an outage were to occur, KUB line workers would not be aware of the electricity flowing from a non-commissioned system onto the grid.
14. The main issue caused by reverse flow of a non-commissioned system is that the excess generation would actually be added to the customer's bill as sold consumption. This is because our base programming on meters has a (F)orward + (R)everse setup to prevent meter tampering or bypassing. When properly commissioned a site's meter would be reconfigured to an independent F & R channel for proper billing and monitoring.

15. My interactions with Solar Titan USA with KUB began in 2020 when they started selling installations in our service area. Since the first job submittal, we have commissioned about 65 installations with Solar Titan USA.
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16. KUB has received many complaints from Solar Titan customers on issues ranging from trouble contacting the company, issues with installation timing, not getting paperwork turned around in a timely fashion, etc.; but the most common complaint is that the system is not producing what was promised by the salesperson for Solar Titan. This conversation frequently starts with the customer stating that Solar Titan has told the customer that the KUB meter is “broken” or isn’t functioning properly, but that has never been the case once evaluated.
17. We have received a complaint or question call from roughly 50% of Solar Titan’s customers at some point. This is an estimate.
18. This indicates that Solar Titan does not properly inform their customers about to what expect during or after the solar system’s installation.
19. Solar Titan has interconnected several systems without submitting the proper paperwork and fees. This leads to KUB not exchanging our meter. Thus, the solar system is not added to our information systems, and KUB does not know if the solar system has passed inspection from the State or City inspection authority.
20. Failing to properly involve the Utility in the interconnection process can lead to billing issues with the customer, and unnecessary re-work due to the improper installation of a system disconnect, etc.
21. I believe solar systems are a beneficial product when they are sold by honest companies and installed by competent, qualified installers.

22. Solar Titan's questionable sales and business practices may impact the solar installation industry by leaving those that have been affected (or those who have read about these incidents and the negative media) by these practices with a misconception that all solar professionals may follow the same substandard protocols and methods.

I declare under penalty of perjury under the laws of the State of Tennessee and pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct. Executed this, the 27<sup>th</sup> day of December, 2022, in Knoxville, TN (city/state).

  
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Bill Warren

